REMARKS

Claims 1-30 are pending in the instant application. Claims 1-30 have been rejected by the Examiner. Claims 1, 9, 11, 19, 21, and 28-30 have been amended. Claims 6 and 16 have been cancelled. The Applicants submit that claims 1-5, 6-15, and 17-30 are in condition for allowance and respectfully request reconsideration and withdrawal of the outstanding rejections. No new matter has been entered.

Claim Rejections Under 35 USC §102

Claims 1-30 have been rejected under 35 U.S.C. 102 as being allegedly anticipated by U.S. Patent No. 6,853,959 to Schroeder et al. (hereinafter "Schroeder"). Claims 6 and 16 have been cancelled and their features incorporated into respective independent claims 1 and 11. Support for other amendments made to independent claims 1, 11, 21, and 30 may be found throughout the Applicants' specification and drawings. Thus, no new matter has been entered by these amendments.

Claim 1, as amended, recites *inter alia*, "an automated issue resolution management (ISRM) system in communication with each of the interactive control systems, the ISRM directing attempts to automatically resolve issues including error conditions relating to the automated manufacturing facility and including a plurality of automated components whose operations the ISRM system is operable to coordinate, the components including:

a recognized issue list containing a listing of return codes for a set of issues associated with the automated equipment;

a first component for automatically ***checking the recognized issue list*** to determine whether a first reported issue brought to its attention is a recognized issue for which an automatic resolution appears to be available; and

a plurality of second components for commanding the taking of automated corrective actions by corresponding portions of the automated manufacturing facility in response to reported issues recognized by the first component, ***each of the second components is respectively dedicated to attempting to resolve a different recognized issue***;

wherein one of the second components is selected, via a respective return code associated with the first reported issue, to direct a corresponding portion of the automated facility to implement an automated corrective action."

These features are neither taught, nor suggested by Schroeder or the art as a whole. Schroeder is directed to a method for chemical addition utilizing adaptive process control optimizations including a combination of expert systems, neural networks, and genetic algorithms. Schroeder teaches goal seeking intelligent software objects (ISOs) for adaptively controlling the rate of addition of a chemical to a process (column 1, line 64 – column 2, line 6). The ISOs determine "output data values which achieve the goals without violating the process constraints; examining, within the expert system software objects, the predictive models that achieve the goals without violating the process constraints; determining, within the expert system software objects, at least one adaptive intervention" (column 2, lines 16-21).

The second components recited in Applicants' claim 1 are directed to error resolution (i.e., issue resolution) associated with various automated equipment in a manufacturing facility. By contrast, the chemical addition processes disclosed in Schroeder utilize real world devices (e.g., sensors) to determine conditions associated with a chemical process and applies adaptive techniques (expert systems) to optimize the current processes. Thus, the error resolution processes of the Applicants' claimed invention are distinct from the chemical optimization processes described in Schroeder. Further, Schroeder is entirely devoid of teaching each of the second components (expert systems) is ***dedicated to attempting to resolve a different recognized issue.***

The adaptive processes described in Schroeder also fail to recite any type of return codes, as recited in Applicants' claim 1. The return codes are associated with specific issues for which the claimed invention seeks to automatically resolve. Schroeder also fails to teach a listing of return codes that is checked to determine whether a resolution is available.

For at least these reasons, the Applicants submit that claim 1 is not anticipated by Schroeder and is allowable over the cited art. Independent claims 11, 21, and 30 have been amended to recite substantially similar features as those recited in amended claim 1. For at least the reasons advanced above with respect to claim 1, the Applicants submit that claims 11, 21, and 30 are also not anticipated by Schroeder.

Claims 2-5 and 7-10 depend from what should be an allowable claim 1. Claims 12-15 and 17-20 depend from what should be an allowable claim 11. Claims 22-29 depend from what should be an allowable claim 21. For at least these reasons, the Applicants submit that claims 2-5, 7-10, 12-15, 17-20, and 22-29 are in condition for allowance. Reconsideration and withdrawal of the outstanding rejections is respectfully requested.

CONCLUSION

It is believed that the foregoing amendments and remarks fully comply with the Office Action and that the claims herein should now be allowable to Applicants. Accordingly, reconsideration and allowance is requested. It is submitted that the foregoing amendments and remarks should render the case in condition for allowance.

Accordingly, as the cited references neither anticipate nor render obvious that which the applicant deems to be the invention, it is respectfully requested that claims 1-5, 7-15, and 17-30 be passed to issue.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 09-0458.

Respectfully submitted,

CANTOR COLBURN LLP
Applicant's Attorneys

By: /Marisa J. Dubuc/
Marisa J. Dubuc
Registration No. 46,673
Customer No. 29371

Date: December 18, 2007

Address: 55 Griffin Road South
Bloomfield, CT 06002
Telephone: (860) 286-2929
Fax: (860) 286-0115